

### III. REMARKS

In the Office Action, objection was made to claims 1-6, and 8-20 for reasons set forth in the Action. Claims 3-6, 9 and 20 were rejected under 35 U.S.C. 112 as being indefinite for reasons set forth in the Action. Claims 1, 2, 8 and 10-13 were rejected under 35 U.S.C. 102 as being anticipated by Gong (Automatic Parsing.), and claims 3-6, 9 and 14-20 were rejected under 35 U.S.C. 103 as being unpatentable over Dimitrova (Semantic video database retrieval) in view of Gong for reasons set forth in the Action.

With respect to the objections raised against the claims 1-6 and 8-20, the claims are amended to refer to individual ones of a plurality of the objects appearing in a scene, thereby to clarify the claims and overcome these objections.

With respect to overcoming the rejections of claims 3, 4, 9 and 20 under 35 U.S.C. 112, the "changes over time" are clarified to be changes in object position, thereby to connect the object position, as a function of time, to the trajectory of the object.

With respect to clarifying the language of claims 5-6 to overcome the rejections under 35 U.S.C. 112, it is noted that the examiner relies on the teaching of the present specification at page 25 with respect to the map, the trajectory, the action, and the camera parameter. Accordingly, in order to clarify this point in the claims 5-6, these claims are amended by inclusion of descriptive processes set forth in the specification, on page 25 at lines 1-4.

The following argument is presented to distinguish the subject matter of the claims from the teachings of the cited art so as to overcome the rejections under 35 U.S.C. 102 and 103 and to show the presence of allowable subject matter in the claims.

Independent claims 3, 4, 9 and 20 include the limitation that the description includes changes in the shape of an object. The examiner acknowledges this on page 9 of the Action (six lines from the bottom of the page) wherein he quotes claim language "using changes in shape of each object". In the previous and the succeeding paragraphs of the Action, the examiner refers to passages from Dimitrova to substantiate the examiner's position, but there is no reference by the examiner to either Dimitrova or Gong with respect to the "using changes in shape of each object".

Upon a study of Dimitrova, it appears that, while he mentions the shape of an object (page 224, left column, nine lines from the bottom), he does not deal with an object having a changing shape (page 223, left column, first paragraph), but may regard an object as being composed of rigid components treated by separate vectors as though they are separate objects. Gong appears to be concerned with the locations and movements of whole objects (page 168), but apparently does not discuss "using changes in shape of each object". In contrast, the present specification teaches (page 9 at line 11) "using changes in shape of each object", and portrays this subject matter in Fig. 2 at block 202, which depicts a running person.

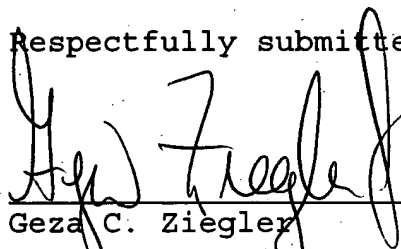
Accordingly, it is urged that independent claims 3, 4, 9 and 20 should be allowable because they recite the subject matter directed to "using changes in shape of each object", which

subject matter is not taught by the cited art. Independent claims 1, 2, 5, 6 and 8 are amended by this response to include subject matter directed to "using changes in shape of each object", thereby to distinguish over the teachings of the cited art, considered individually or in combination, and to obtain allowance of these claims as well as their respective dependent claims.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$120 is enclosed for a one-month extension of time and additional claim fees. The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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Reg. No. 44,004

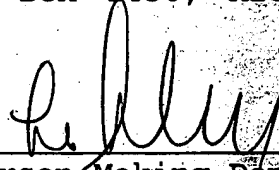
15 July 2005  
Date

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